

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-2(c)

**THE LAW OFFICES OF
JOSEPH M. RASA, L.L.C.**

565 Newark Pompton Turnpike
Pompton Plains, NJ 07444
(973) 831-8800

Attorneys for Debtors,
Ramon Rego and Elizabeth A. Rego

In Re:

RAMON REGO AND ELIZABETH A. REGO,

Debtors.

Chapter: 13

Case No.: 10-13244-MS

Judge: Hon. Morris Stern, U.S.B.J.

Hearing Date: December 16, 2010

COUNSEL'S APPLICATION FOR PAYMENT OF COUNSEL FEES AND EXPENSES

JOSEPH M. RASA, ESQ., counsel for Debtors, Ramon Rego and Elizabeth A. Rego, in support of Counsel's Application for Counsel Fees and Expenses, respectfully states and represents as follows:

1. The Debtors initially retained this firm in late 2007 to prepare and file a Chapter 7 bankruptcy petition on their behalf. The total fee to be charged by this firm for legal services rendered or to be rendered for or on behalf of the Debtors in the Chapter 7 bankruptcy case, exclusive of costs, was \$3,500.00. Services other than those specified in the retainer agreement were to be billed and paid by the Debtors at the rate of \$225.00 per hour. A copy of this firm's retainer agreement is attached hereto as Exhibit "A", and incorporated into this Application by reference.

2. The retainer agreement provides that the services to be rendered by this firm in connection with the \$3,500.00 fee were:

- a. the preparation and filing of the bankruptcy petition (including the analysis of the Debtors' finances);
- b. attendance at the meeting of the creditors; and
- c. the preparation and review of correspondence to the Debtors and their creditors concerning the bankruptcy filing.

3. This case was complicated because Ramon Rego, a physician, was in the process of winding down a medical practice which failed in 2007. Moreover, over the subsequent two (2) years, Dr. Rego was largely unavailable due to his employment situation which greatly hampered the administration of this case. Finally, even when Dr. Rego was available, much of the information needed to analyze the Debtors' finances was simply not available because Dr. Rego was unable to obtain source documentation from his prior business associates. In fact, it is believed that the Debtors have not yet filed their 2007 income tax return because of incomplete accounting records from that year.

4. After analyzing the Debtors' finances and their goals with respect to their assets, it was determined that a Chapter 13 case would be preferable. However, due to the Debtors' unavailability, it was very difficult to gather information necessary to prepare and file the petition.

5. By the time the Debtors were ready to file their petition in early 2010, most of Dr. Rego's business issues were moot. Therefore, the Debtors were charged the standard fee for their Chapter 13 case in accordance with D.N.J. LBR 2016-1. The Disclosure of Compensation of Attorney for Debtors' Statement was completed accordingly and is incorporated by reference into this Application. This firm's custom is to charge an hourly rate for any services performed outside of the standard Chapter 13 case. In this case, as aforesaid, any such services were billed at the rate of \$225.00 per hour, the rate specified in the retainer agreement signed by the Debtors for services performed outside of the standard Chapter 7 case.

6. Pursuant to the aforesaid Disclosure Statement and this firm's usual practices, the legal services rendered or to be rendered by this firm in connection with a Chapter 13 case include the following:

- a. Analysis of the Debtors' financial situation, and rendering advice to the Debtors in determining whether to file a petition in bankruptcy;
- b. Preparation and filing of the petition, schedules, statement of affairs and plan;
- c. Representation of the Debtors at the meeting of creditors and confirmation hearing in the case; and
- d. Negotiations with secured creditors to reduce to market value; exemption planning; the preparation and filing of reaffirmation agreements and applications as needed.

7. The legal services that are excluded from the standard Chapter 13 fee (or Chapter 7 fee) are all other services not listed above and specifically:

- a. Representation of the debtors in any dischargeability actions;
- b. Judicial lien avoidance actions;
- c. Relief from stay actions;
- d. Adversary proceedings; and
- e. The preparation and filing of motions pursuant to 11 U.S.C. § 522(f)(2)(A) for avoidance of liens on household goods.

8. The source of compensation paid or to be paid is the Debtors' earnings from employment. The compensation is to be paid through the Chapter 13 plan or by the Chapter 13 Standing Trustee from the Debtors' proceeds in the Trustee's possession in the event that the Chapter 13 case is dismissed or converted.

9. The dates, services, time spent, identity of the person rendering said services and actual expenses to date are set forth in detail on the computerized billing statement attached hereto as Exhibit "B" and incorporated into this Application by reference.

10. In this case, the undersigned attorney is the only person that rendered, or will be rendering services on behalf of the Debtors. The billing rate for this attorney is \$225.00 per hour in this case, and the total time spent by this attorney in connection with this matter is set forth on the computerized billing statement attached hereto as Exhibit "B".

11. As indicated, this firm's retainer agreement in this case provides that the attorney will charge a fee calculated at the rate of \$225.00 per hour for any services not specifically set forth in the retainer agreement. This fee is reasonable and customary, and is in accordance with fees charged by other practitioners in this venue for services rendered outside of the standard fees in Chapter 13 or Chapter 7 cases.

12. Pursuant to Judge Lyon's decision in In re Szymczak, 246 B.R. 774 (Bankr.D.N.J. 2000) and D.N.J. LBR 2016-1(j), normal and customary services in a Chapter 13 case include, *inter alia*, "furnishing general legal advice to debtors regarding chapter 13; preparation of the debtors' bankruptcy petition, schedules and their chapter 13 plan; reviewing proofs of claim filed in the debtor's case; and attending the debtor's § 341(a) meeting of creditors and their confirmation hearing." In re Szymczak, 246 B.R. at 782.

13. The Szymczak Court identified a number of services rendered by the attorneys in that case which were not normal and customary in a Chapter 13 case, included time spent negotiating defaults and motions to lift automatic stays, the amendment of the debtors' bankruptcy schedules and modification of the plan of reorganization, and the preparation of an Affidavit in Lieu of Attendance at the 341(a) meeting of creditors necessitated by the debtors' compromised mental state. In re Szymczak, 426 B.R. at 782.

14. A brief summarization of the services rendered in the within case that are not normal and customary for a Chapter 13 bankruptcy case include the following: rendering advice relative to accounting and tax issues; moving for the adjournment of state court execution sale(s); defending motions to vacate stay and notices of default proceedings. Moreover, as noted, the Debtors themselves, although not likely intentionally, caused the fees in this case to be inflated due to their inability to timely respond to requests for information and the like.

15. Of the 94.6 hours billed by this firm to date, it is estimated that only 46.3 hours were devoted to services that are normal and customary in a Chapter 13 bankruptcy case. In fact, in this firm's experience, 46.3 hours are an excessive amount of time to devote to a typical pre-confirmation Chapter 13 case. As aforesaid, this was due primarily to the difficulties obtaining information from the Debtors due to Dr. Rego's unavailability as a result of his intensive work schedule, as well as the inability of Dr. Rego to obtain source documentation from his prior business associates.

16. The balance of the hours billed in this matter (48.3) were devoted to services that are not normal and customary in a Chapter 13 case.

17. The time entries in italics on the time sheet attached as Exhibit "B" represent time entries which were billable at the rate of \$225.00 per hour pursuant to this firm's retainer agreement with the Debtors. The total fee for these services is \$10,867.50, which should be added to the standard fee of \$3,500.00 related to the standard time entries on Exhibit "B" that are not in italics.

18. Additionally, this firm has incurred \$429.43 in expenses on behalf of the Debtors.

19. The Debtors paid the total sum of \$1,800.00 to this firm since the beginning of the retention. Of this sum, \$1,400.00 has been allocated to attorney fees and \$400.00 has been allocated to expenses.

20. Thus, the total fees currently owed to this firm are \$12,967.50, and the total expenses currently owed to this firm are \$29.43, for a total amount owed of \$12,996.93.

21. In summary, request is respectfully made that the Court enter an Order allowing this firm the sum of **\$12,996.93** which represents counsel fees in the amount of \$12,967.50 plus expenses in the amount of \$29.43.

22. It is further respectfully requested that the allowance be paid through the Chapter 13 plan as an administrative priority, or in the event that the case is converted to another Chapter or dismissed, the allowance be paid by the Chapter 13 Trustee as an administrative priority from the Debtors' proceeds in the Trustee's possession immediately upon the conversion or dismissal of the case.

23. It should be noted by the Court that the Debtors anticipate converting this case to a Chapter 7 or a Chapter 11 case on or before December 31, 2010.

24. The undersigned attorney is admitted to practice before this Court and in this State, maintains a law practice at the address shown above, is a disinterested person with respect to this bankruptcy case, does not hold or represent an interest adverse to the estate with respect to the matter for which the attorney has been employed, and is competent and experienced in the handling of Chapter 13 bankruptcy cases.

WHEREFORE, the undersigned attorney respectfully applies for allowance of the compensation described above in this Application and requests that the allowance be paid through the Chapter 13 plan as an administrative priority, or in the event that the case is converted to another Chapter or dismissed, the allowance be paid by the Chapter 13 Trustee as an administrative priority from the Debtors' proceeds in the Trustee's possession immediately upon the conversion or dismissal of the case.

**THE LAW OFFICES OF
JOSEPH M. RASA, L.L.C.**
Attorneys for Debtors,
Ramon Rego and Elizabeth A. Rego

DATED: November 23, 2010

/S/ JOSEPH M. RASA, ESQ.
JOSEPH M. RASA, ESQ.

EXHIBIT

“A”

Joseph M. Rasa

A Limited Liability Company

Joseph M. Rasa, Esq.
Member, NJ Bar
Member, NY Bar
Admitted, US Tax Court
LL.M. Taxation

November 6, 2007

Ramon Rego, M.D.
65 Woodland Road
P.O. Box 470
Brookside, New Jersey 07926

Re: Rego - Bankruptcy
Our File No.: 2642-001

Dear Dr. Rego:

We are pleased that you have decided to retain this firm as counsel in connection with your Chapter 7 Bankruptcy matter.

This letter describes the basis upon which our firm will provide legal services to you, and how we will be compensated for our services.

Be assured that we will do our utmost to serve you effectively. While we cannot guarantee the success of any given venture, we will strive to represent your interests professionally and efficiently. I will have primary responsibility for your representation, and will utilize other attorneys and/or legal assistants in our firm in the best exercise of my professional judgment. If, at any time you have any questions, concerns, or criticisms, please contact me at once.

1. **FEE FOR LEGAL SERVICES:** In connection with our legal services, we will charge you a flat fee of \$3,500.00 which must be paid in full prior to the filing of the bankruptcy petition. Our services include the preparation and filing of the bankruptcy petition, attendance at the meeting of creditors and the preparation and review of correspondence to you and your creditors concerning your bankruptcy filing.

If any of your creditors file an objection to your bankruptcy petition which requires further representation in bankruptcy court or otherwise, or you require any other services not set forth in this agreement, we will represent you on an hourly basis at a rate of \$225.00 per hour. In addition, we may

request a retainer from you prior to rendering those services. Our firm's legal fees, as well as other costs, will be billed against the retainer. You understand that the retainer is not an estimate of total fees and costs, but merely an advance for security. Whenever the retainer is exhausted, we reserve the right to request further retainers from you in addition to requiring that you pay our monthly invoices. Further, you agree to pay all retainers after the initial retainer within ten (10) days of our request therefore. Unless otherwise agreed in writing, any unused retainer will be refunded to you at the conclusion of our services.

2. FILING FEE EXPENSES: In addition to the fee for legal services, we will require the sum of \$299.00 for the bankruptcy petition filing fee. This sum must be paid prior to the filing of the bankruptcy petition.

3. OUT-OF-POCKET EXPENSES: In addition to our legal fees, we will require the sum of ~~\$1,500.00~~ *100.00 in payment of our out-of-pocket expenses such as filing fees, other than those mentioned above, credit reporting fees, tax transcript fees, service of process charges, messenger and other delivery fees, postage, court and deposition reporters' fees, jury fees, long distance telephone charges, photocopying and other reproduction costs, travel costs including parking, mileage, transportation, meals and hotel costs, investigation expenses, consultants' fees, expert witness fees, mediator, arbitrator and/or special master fees, and other similar items, and other out-of-pocket expenses. We may request additional payment(s) in the future if the above amount is insufficient to cover our expenses. Except for the items listed below, all costs and expenses will be charged to you at our cost.

In office photocopies:	\$0.25/page
Facsimiles:	\$0.25/page
Mileage:	\$0.36/mile
Express mail charges:	\$25.00/delivery

4. MONTHLY STATEMENTS: Our statements generally will be prepared and mailed during the month following the month in which services were rendered and/or costs were advanced. We expect payment within a reasonable time after the statement is received by you, and greatly appreciate your prompt payment of the same. Further, interest will be charged at the rate of one and one-half percent (1½%) per month on any outstanding balance due to our firm thirty (30) days after invoicing.

Rego - 2642-001

November 6, 2007

Page 3 of 3

5. TERMINATION OF SERVICES: You will have the right to terminate our representation at any time. We will have the same right, and at our sole option, we may discontinue legal services if invoices are not paid timely.

We request that you acknowledge your acceptance of the terms of our firm's representation of you in this matter by signing the enclosed copy of this letter in the space provided, and returning the same to me in the enclosed, self-addressed envelope. If you have any questions, please do not hesitate to contact me.

On a personal note, I am very pleased that you have selected our firm to represent you. We look forward to serving you and we shall use our best efforts on your behalf.

Very truly yours,

**THE LAW OFFICES OF
JOSEPH M. RASA, L.L.C.**

By: 

JOSEPH M. RASA

JMR:lat
Enclosures

AGREED AND ACCEPTED:

By: _____

RAMON REGO, M.D.

Date

Rego - 2642-001
November 6, 2007
Page 3 of 3

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THE LAW OFFICES OF
JOSEPH M. RASA, L.L.C.

By: 

JOSEPH M. RASA

JMR:lat
Enclosures

AGREED AND ACCEPTED:

By: 

RAMON REGO, M.D.

2-17-10
Date

EXHIBIT

“B”

The Law Offices of Joseph M. Rasa, L.L.C.

565 Newark Pompton Turnpike
Pompton Plains, New Jersey 07444

Ph:(973) 831-8800

Fax: (973) 831-8801

Ramon Rego
Elizabeth A. Rego
65 Woodland Road
Brookside, NJ 07962

November 23, 2010

Attention:

File #: 2642-001
Inv #: Statement

RE: Rego - Bankruptcy

DATE	DESCRIPTION	HOURS	AMOUNT	LAWYER
Oct-10-07	Telephone call with Attorney Mike Doran re: Issues regarding new client Dr. Ramon Rego	0.40	90.00	JMR
Oct-31-07	Meeting with client Dr. Rego re: Background of client's matter; further action to be taken in connection with client's matter	2.40	540.00	JMR
Nov-06-07	Telephone call with Attorney Michael Doran re: Status of client's matter; further action to be taken in connection with client's matter	0.30	67.50	JMR
Sep-05-08	Telephone call with client Ray re: Status of client's matter; further action to be taken in connection with client's matter	0.10	22.50	JMR
Oct-03-08	Meeting with client Ramon Rego re: Background of client's matter; further action to be taken in connection with client's matter	1.50	337.50	JMR
Mar-03-09	Telephone call with client Ray re: Make appointment	0.20	45.00	JMR
Mar-30-09	Telephone call with client Ray re: Status of client's matter; further action to be taken in connection with client's matter; client	0.40	90.00	JMR
<i>Jun-25-09</i>	<i>Review of file</i>	<i>0.40</i>	<i>90.00</i>	<i>JMR</i>
<i>Jun-26-09</i>	<i>Meeting with client Dr. Rego re: Status; further action to be taken in connection with</i>	<i>1.90</i>	<i>427.50</i>	<i>JMR</i>

	<i>client's matter; whether client moving forward; compliance issues</i>			
Jul-17-09	Review of documents re: Questionnaire	0.20	45.00	JMR
Aug-21-09	Review of file re: Status of client's matter; further action to be taken in connection with client's matter	0.20	45.00	JMR
Nov-06-09	<i>Telephone call with client Ray re: Status of client's matter; client to decide if proceeding; further action to be taken in connection with client's matter</i>	0.40	90.00	JMR
Dec-02-09	<i>Letter to client re: Request to contact us to schedule meeting</i>	0.20	45.00	JMR
Dec-03-09	Telephone call with client Dr. Rego re: Dropping off information; call and make appointment	0.10	22.50	JMR
Dec-15-09	Telephone call with client Ray re: Schedule appointment	0.10	22.50	JMR
Dec-17-09	Review of file; prepare for meeting; attendance at meeting with client; follow up to file	2.90	652.50	JMR
Dec-28-09	Review of file	0.20	45.00	JMR
	Telephone call with client Ray re: Additional items needed	0.10	22.50	JMR
	Review of documents re: Identity info from wife	0.30	67.50	JMR
Dec-29-09	<i>Telephone call with client Ray re: Status of client's matter; further action to be taken in connection with client's matter</i>	0.10	22.50	JMR
Dec-30-09	<i>Review of file re: Confirm sheriff sale date</i>	0.10	22.50	JMR
Jan-04-10	<i>Telephone call with client Ray re: Status of client's matter; further action to be taken in connection with client's matter</i>	0.20	45.00	JMR
	<i>Review of file ; prepare letter to sheriff adjourning sale</i>	0.50	112.50	JMR
	<i>Preparation of documents for transmittal to</i>	0.20	45.00	JMR

	<i>sheriff</i>			
	<i>Review letter from Attorney Fein Such re: Reinstatement amount</i>	<i>0.10</i>	<i>22.50</i>	<i>JMR</i>
	<i>Telephone call with client Ray re: Reinstatement of loan</i>	<i>0.20</i>	<i>45.00</i>	<i>JMR</i>
<i>Jan-05-10</i>	<i>Telephone call with other party Sheriff re: Status of client's matter; further action to be taken in connection with client's matter</i>	<i>0.10</i>	<i>22.50</i>	<i>JMR</i>
	<i>Telephone call with client Ray re: Status of client's matter; whether client is moving forward with filing; compliance issues; further action to be taken in connection with client's matter</i>	<i>0.30</i>	<i>67.50</i>	<i>JMR</i>
	<i>Letter to other party sheriff re: Transmittal of letter requesting adjournment</i>	<i>0.20</i>	<i>45.00</i>	<i>JMR</i>
<i>Jan-31-10</i>	<i>Drafting of documents re: Petition and plan</i>	<i>1.10</i>	<i>247.50</i>	<i>JMR</i>
<i>Feb-01-10</i>	<i>Letter to client re: Need to file to stop sheriff sale</i>	<i>0.20</i>	<i>45.00</i>	<i>JMR</i>
<i>Feb-03-10</i>	<i>Telephone calls with client Ray re: Sheriff sale stayed</i>	<i>0.40</i>	<i>90.00</i>	<i>JMR</i>
	<i>Letter to client Ray re: Sheriff sale stayed</i>	<i>0.20</i>	<i>45.00</i>	<i>JMR</i>
	<i>Review and revise documents re: Petition and plan; order credit report; merge into petition; review creditors; file documents electronically with bankruptcy court</i>	<i>5.60</i>	<i>1,260.00</i>	<i>JMR</i>
<i>Feb-04-10</i>	<i>Letter to other party Morris County Sheriff re: Notice of bankruptcy filing; sheriff sale should be stayed</i>	<i>0.30</i>	<i>67.50</i>	<i>JMR</i>
<i>Feb-05-10</i>	<i>Review of file re: Adjourned sheriff sale</i>	<i>0.10</i>	<i>22.50</i>	<i>JMR</i>
<i>Feb-12-10</i>	<i>Letter to client re: Meeting to sign completion documents</i>	<i>0.20</i>	<i>45.00</i>	<i>JMR</i>
<i>Feb-17-10</i>	<i>Telephone call with client Ray re: Status of client's matter; further action to be taken in connection with client's matter</i>	<i>0.20</i>	<i>45.00</i>	<i>JMR</i>
	<i>Review and revise documents re: Petition and plan</i>	<i>4.30</i>	<i>967.50</i>	<i>JMR</i>

	Telephone call with client Ray re: Status of client's matter; further action to be taken in connection with client's matter	1.30	292.50	JMR
Feb-18-10	Prepare for meeting with clients; meeting with clients; discuss further action to be taken in connection with client's matter	0.80	180.00	JMR
	Review of documents re: Meeting of creditors	0.10	22.50	JMR
Feb-24-10	File documents online with bankruptcy court	0.20	45.00	JMR
	Review letter from other party Chase Home Finance re: Mortgage issues	0.20	45.00	JMR
	Letter to client Rego re: Letter from Chase and intentions	0.20	45.00	JMR
Mar-12-10	Letter to client Ray re: Meeting of creditors	0.10	22.50	JMR
	Telephone call with client Ray re: Meeting of creditors	0.10	22.50	JMR
Mar-15-10	Prepare for 341 meeting of creditors meeting	0.80	180.00	JMR
Mar-16-10	Attendance at 341 meeting of creditors; Travel to/from Newark	2.40	540.00	JMR
	Review of file	0.30	67.50	JMR
Mar-23-10	Letter to accountant Krikorian re: Transmittal of notification of bankruptcy filing	0.30	67.50	JMR
Mar-25-10	Review of documents re: Proofs of claim; objections to confirmation	0.30	67.50	JMR
	<i>Review of file ; review Leader's motion; begin response; letter to Attorney Morton re: Possible global resoution</i>	<i>0.70</i>	<i>157.50</i>	<i>JMR</i>
	<i>Letters to Attorney Morton re: Adjournment; other issues</i>	<i>0.30</i>	<i>67.50</i>	<i>JMR</i>
Mar-26-10	<i>Telephone call with Attorney Griffith from John Morton's office re: Resolution of motion and objection</i>	<i>0.20</i>	<i>45.00</i>	<i>JMR</i>
	<i>Letter to client re: Resolution of motion and</i>	<i>0.20</i>	<i>45.00</i>	<i>JMR</i>

	<i>objection; request for direction</i>			
	<i>Review of documents; Legal Research</i>	<i>0.40</i>	<i>90.00</i>	<i>JMR</i>
	<i>Drafting of documents re: Response</i>	<i>0.60</i>	<i>135.00</i>	<i>JMR</i>
	<i>Review of documents re: POC</i>	<i>0.20</i>	<i>45.00</i>	<i>JMR</i>
<i>Mar-30-10</i>	<i>Telephone call with Attorney Griffith from John Morton's office re: Settlement of matter</i>	<i>0.30</i>	<i>67.50</i>	<i>JMR</i>
<i>Mar-31-10</i>	<i>Review of documents re: Proof of claims</i>	<i>0.30</i>	<i>67.50</i>	<i>JMR</i>
	<i>Telephone call with Attorney Luke re: Adjourn motion</i>	<i>0.20</i>	<i>45.00</i>	<i>JMR</i>
	<i>Letter to Attorney Luke re: Motion adjournment</i>	<i>0.20</i>	<i>45.00</i>	<i>JMR</i>
<i>Apr-08-10</i>	<i>Telephone call with other party Trustee re: Adjourn confirmation hearing</i>	<i>0.20</i>	<i>45.00</i>	<i>JMR</i>
	<i>Letter to Attorney Griffith re: Resolution of motion</i>	<i>0.20</i>	<i>45.00</i>	<i>JMR</i>
<i>Apr-14-10</i>	<i>Telephone call with Attorney Griffith re: Status of motion; consent to resolve</i>	<i>0.20</i>	<i>45.00</i>	<i>JMR</i>
	<i>Telephone call with client Ray re: Status of client's matter; further action to be taken in connection with client's matter</i>	<i>0.30</i>	<i>67.50</i>	<i>JMR</i>
	<i>Letter to client Ray re: Status of client's matter; further action to be taken in connection with client's matter</i>	<i>0.20</i>	<i>45.00</i>	<i>JMR</i>
	<i>Review of documents re: Proposed order</i>	<i>0.20</i>	<i>45.00</i>	<i>JMR</i>
	<i>Drafting of documents re: Opposition to motion; COS; letter to Judge Stern</i>	<i>2.80</i>	<i>630.00</i>	<i>JMR</i>
<i>Apr-15-10</i>	<i>Prepare for hearing re: Review case law</i>	<i>0.80</i>	<i>180.00</i>	<i>JMR</i>
	<i>Attendance at hearing ; Travel to/from Newark, New Jersey</i>	<i>2.60</i>	<i>585.00</i>	<i>JMR</i>
<i>Apr-29-10</i>	<i>Review letter from Attorney Griffith re: Resolution of matter</i>	<i>0.10</i>	<i>22.50</i>	<i>JMR</i>
	<i>Letter to Attorney Griffith re: Resolution of</i>	<i>0.20</i>	<i>45.00</i>	<i>JMR</i>

	<i>matter</i>			
Apr-30-10	Telephone call with Attorney Morton re: Insurance lapsed	0.10	22.50	JMR
	Telephone call with client Ray re: Insurance lapsed	0.10	22.50	JMR
May-01-10	Telephone call with client Ray re: Insurance was reinstated	0.10	22.50	JMR
May-04-10	Review of documents re: Order resolving motion	0.10	22.50	JMR
	Telephone call with Attorney Griffith re: Order resolving motion; insurance issue	0.30	67.50	JMR
	Letter to client Ray re: Request for insurance information	0.10	22.50	JMR
May-05-10	Telephone call with client Ray re: Resolve motion; obtain insurance information	0.60	135.00	JMR
	Telephone call with client Ray re: status of client's matter; further action to be taken in connection with client's matter	0.10	22.50	JMR
May-06-10	Attendance at hearing re: Motion hearing	1.60	360.00	JMR
May-26-10	Review of documents re: Proof of claim	0.20	45.00	JMR
May-27-10	Review of documents re: Objection to plan	1.00	225.00	JMR
May-28-10	Letter to Attorney Greenburg re: Confirm adjournment of confirmation hearing	0.10	22.50	JMR
Jun-01-10	Telephone call with Attorney Griffith re: Resolution of objection	0.20	45.00	JMR
Jun-03-10	Review of documents re: Motion to vacate stay	0.20	45.00	JMR
	Letter to client Ray and Elizabeth re: Request for meeting to discuss motion to vacate stay and other issues	0.20	45.00	JMR
Jun-24-10	Letter to client Ray and Elizabeth re: Resolution of motion; other issues	0.10	22.50	JMR
	Review letter from Attorney Melissa Licker re: Resolution of matter	0.10	22.50	JMR

	<i>Telephone call with client Ray re: Status of client's matter; further action to be taken in connection with client's matter</i>	0.20	45.00	JMR
	<i>Letter to Attorney Licker re: Proposed resolution</i>	0.20	45.00	JMR
Jun-29-10	Letter to client re: Meeting issues	0.10	22.50	JMR
	Review of documents re: Tax records; valuation; other issues	0.80	180.00	JMR
Jul-01-10	Meeting with client Ray re: Review objection	1.40	315.00	JMR
	Drafting of documents re: Submissions responsive to objection	2.80	630.00	JMR
Jul-02-10	Letter to Attorney Petrolino re: Transmittal of documents	0.20	45.00	JMR
Jul-06-10	Review letter from client Elizabeth re: Paystubs needed	0.30	67.50	JMR
Jul-07-10	Telephone call with Attorney Petrolino re: Discuss objections, etc.	0.20	45.00	JMR
	<i>Letter to client Ray re: Possible dismissal of case due to non-compliance</i>	0.20	45.00	JMR
Jul-08-10	Telephone call with Attorney Petrolino re: Status of client's matter; further action to be taken in connection with client's matter	0.10	22.50	JMR
Jul-13-10	Review of file re: Adjournment	0.10	22.50	JMR
Jul-14-10	<i>Letter to client Ray re: Status of client's matter; further action to be taken in connection with client's matter</i>	0.20	45.00	JMR
Jul-19-10	<i>Review of documents re: Order resolving motion</i>	0.20	45.00	JMR
	<i>Letter to Attorney Greenberg re: Establish payment of counsel fees</i>	0.20	45.00	JMR
Jul-26-10	<i>Letter to client Ray and Elizabeth re: Request that they contact me</i>	0.40	90.00	JMR
Aug-03-10	<i>Telephone call with United States Department</i>	0.20	45.00	JMR

	<i>of Treasury, Internal Revenue Service re: Returns that were filed</i>			
	<i>Telephone call with client Elizabeth re: Status of client's matter; further action to be taken in connection with client's matter</i>	0.20	45.00	JMR
	<i>Telephone calls with client Ray re: Status of client's matter; further action to be taken in connection with client's matter</i>	0.70	157.50	JMR
	<i>Letter to United States Department of Treasury, Internal Revenue Service re: Transmittal of returns</i>	0.40	90.00	JMR
Aug-07-10	<i>Review of documents re: Order resolving motion</i>	0.10	22.50	JMR
	<i>Letter to client re: Transmittal of order</i>	0.20	45.00	JMR
Aug-20-10	<i>Telephone call with client Elizabeth re: Status of client's matter; further action to be taken in connection with client's matter</i>	0.20	45.00	JMR
	<i>Letter to client Ray re: Status of client's matter; further action to be taken in connection with client's matter</i>	0.20	45.00	JMR
Aug-24-10	<i>Review of documents re: All missing documents; latest tax returns; compile pay stubs</i>	0.60	135.00	JMR
	<i>Letter to client Ray re: Problems with income tax returns; advise as to further action to be taken in connection with client's matter</i>	0.20	45.00	JMR
Aug-25-10	<i>Review of file</i>	0.30	67.50	JMR
	<i>Letter to Attorney Petrolino re: Transmittal of documents; further action to be taken in connection with client's matter</i>	0.30	67.50	JMR
	<i>Letter to client Ray re: Status of client's matter; further action to be taken in connection with client's matter</i>	0.30	67.50	JMR
Aug-26-10	<i>Review letter from Attorney Greenberg re: Adjournment granted</i>	0.10	22.50	JMR
	<i>Letter to client re: Send documents immediately</i>	0.10	22.50	JMR
	<i>Telephone call with client Ray re: Status of</i>	0.40	90.00	JMR

	client's matter; further action to be taken in connection with client's matter			
Aug-30-10	Letter to client Ray re: Request for tax returns	0.10	22.50	JMR
Sep-03-10	Review of documents re: 2009 tax return	0.20	45.00	JMR
	Letter to client Ray and Elizabeth re: Withdrawing from case and reasons therefor; invoices, etc.	0.70	157.50	JMR
Sep-07-10	Review and revise letter to client s re: Withdrawing from case	0.20	45.00	JMR
Sep-08-10	Review of documents re: Order submitted to court	0.20	45.00	JMR
Sep-13-10	Telephone call with other party Noreen re: Client's car impounded due to failure of leasing company to release registration	0.30	67.50	JMR
	Review of documents re: Certificate of default	0.30	67.50	JMR
	Telephone call with client Elizabeth re: Status of client's matter; further action to be taken in connection with client's matter	0.20	45.00	JMR
Sep-15-10	Telephone call with Attorney John Morton re: Moving for vacation of stay on short notice	0.10	22.50	JMR
	Review of documents re: Issues to address with clients	0.70	157.50	JMR
	Meeting with client Ray and Elizabeth re: Status of client's matter; further action to be taken in connection with client's matter	1.30	292.50	JMR
Sep-17-10	Letter to Attorney Petrolino re: Transmittal of tax return and paystub to trustee	0.20	45.00	JMR
	Review of documents re: Motion to vacate filed by leaders; short notice application	0.30	67.50	JMR
	Telephone call with Attorney Licker re: Response to default application	0.10	22.50	JMR
Sep-20-10	Drafting of documents re: Opposition to motion to vacate	1.30	292.50	JMR
	Review of documents re: Motion to vacate and shorten time order	0.40	90.00	JMR

	<i>Telephone call with client Ray re: Issues in connection with automobile</i>	<i>0.20</i>	<i>45.00</i>	<i>JMR</i>
<i>Sep-21-10</i>	<i>Telephone call with Attorney Licker re: Status of client's matter; further action to be taken in connection with client's matter</i>	<i>0.10</i>	<i>22.50</i>	<i>JMR</i>
<i>Sep-22-10</i>	<i>Drafting of documents re: Opposition to motion to vacate</i>	<i>1.80</i>	<i>405.00</i>	<i>JMR</i>
	<i>File documents electronically with bankruptcy court</i>	<i>0.20</i>	<i>45.00</i>	<i>JMR</i>
<i>Sep-23-10</i>	<i>Drafting of documents re: Opposition to certificate of default</i>	<i>0.50</i>	<i>112.50</i>	<i>JMR</i>
	<i>Attendance at hearing ; travel to/from Newark, New Jersey</i>	<i>3.70</i>	<i>832.50</i>	<i>JMR</i>
<i>Sep-25-10</i>	<i>Review and revise documents re: Opposition to certificate of default; file documents electronically with bankruptcy court</i>	<i>1.20</i>	<i>270.00</i>	<i>JMR</i>
<i>Sep-27-10</i>	<i>Review of file</i>	<i>0.40</i>	<i>90.00</i>	<i>JMR</i>
<i>Sep-29-10</i>	<i>Letter to Attorney Petrolino re: Transmission of additional documentation; further action to be taken in connection with client's matter</i>	<i>0.20</i>	<i>45.00</i>	<i>JMR</i>
<i>Oct-05-10</i>	<i>Telephone call with Attorney Petrolino re: Issues in connection with confirmation</i>	<i>1.60</i>	<i>360.00</i>	<i>JMR</i>
<i>Oct-06-10</i>	<i>Letter to client re: Mortgage default issues</i>	<i>0.10</i>	<i>22.50</i>	<i>JMR</i>
	<i>Review letter from Attorney Trustee re: Status of client's matter; further action to be taken in connection with client's matter</i>	<i>0.10</i>	<i>22.50</i>	<i>JMR</i>
	<i>Telephone call with other party Noreen re: Status of client's matter; further action to be taken in connection with client's matter</i>	<i>0.40</i>	<i>90.00</i>	<i>JMR</i>
	<i>Telephone call with client Ray re: Status of client's matter; further action to be taken in connection with client's matter</i>	<i>0.30</i>	<i>67.50</i>	<i>JMR</i>
	<i>Review of file</i>	<i>0.20</i>	<i>45.00</i>	<i>JMR</i>
<i>Oct-07-10</i>	<i>Review of documents re: Order</i>	<i>0.10</i>	<i>22.50</i>	<i>JMR</i>

	<i>Letter to client Ray re: Not opposing entry of order because it is accurate</i>	0.10	22.50	JMR
	<i>Letter to client Ray re: Mortgage payment</i>	0.10	22.50	JMR
	<i>Telephone call with client Ray re: Mortgage payment</i>	0.10	22.50	JMR
Oct-18-10	<i>Drafting of documents re: Supplemental certification and COS</i>	0.60	135.00	JMR
	<i>Letter to client Ray re: Sign Certification</i>	0.20	45.00	JMR
	<i>File documents electronically with bankruptcy court</i>	0.20	45.00	JMR
Oct-19-10	<i>Telephone call with Attorney Petrolino re: Discuss objections</i>	0.10	22.50	JMR
	<i>Letter to Attorney Petrolino re: Discuss objections</i>	0.10	22.50	JMR
	<i>Letter to Attorney Melissa Licker re: Response to cert of default</i>	0.20	45.00	JMR
	<i>Letter to client Ray re: Status of completion of tax returns; further action to be taken in connection with client's matter</i>	0.10	22.50	JMR
Oct-20-10	<i>Review letter from Attorney Trustee re: Adjourn hearing; further information needed</i>	0.20	45.00	JMR
	<i>Letter to other party Trustee re: Transmittal of additional information; further information to be transmitted; request to discuss objection</i>	0.30	67.50	JMR
	<i>Telephone call with Attorney Melissa Licker re: Resolve certificate of default</i>	0.50	112.50	JMR
	<i>Letter to Attorney Melissa re: Resolve certificate of default</i>	0.20	45.00	JMR
Oct-27-10	<i>Letter to client Ray re: Status of client's matter; further action to be taken in connection with client's matter</i>	0.20	45.00	JMR
	<i>Telephone call with Attorney Sweeney re: Status of client's matter; further action to be taken in connection with client's matter</i>	0.30	67.50	JMR

	Review and revise letter to Attorney Wolfenson re: Objection to claim	0.10	22.50	JMR
Nov-03-10	Telephone call with other party Noreen re: Payment information	0.10	22.50	JMR
	Letter to client Ray re: Broker price opinion, etc.	0.10	22.50	JMR
	Telephone call with client Ray re: Signed broker price opinion	0.10	22.50	JMR
	Letter to client re: Need for signed BPO; amounts to pay mortgagee and trustee	0.20	45.00	JMR
Nov-04-10	<i>Review of documents re: Conformed order curing default; transmit to client</i>	<i>0.10</i>	<i>22.50</i>	<i>JMR</i>
Nov-08-10	<i>Telephone call with other party Noreen re: Provide trustee and mortgage payment amounts</i>	<i>0.10</i>	<i>22.50</i>	<i>JMR</i>
	Review of documents re: BPO signed	0.10	22.50	JMR
	Letter to other party trustee re: Status of client's matter; further action to be taken in connection with client's matter	0.70	157.50	JMR
Nov-09-10	Review of file	1.60	360.00	JMR
Nov-10-10	Telephone call with Attorney Wolfenson re: Judgment against Rego	0.40	90.00	JMR
Nov-11-10	Letter to Attorney Wolfenson re: Request copy of judgment	0.10	22.50	JMR
	Review of documents re: Proof of claim	0.20	45.00	JMR
	<i>Legal Research re: Possible conversion; implications; means test issues upon conversion to chapter 7</i>	<i>1.00</i>	<i>225.00</i>	<i>JMR</i>
	<i>Telephone call with client Ray re: Status of client's matter; further action to be taken in connection with client's matter</i>	<i>0.50</i>	<i>112.50</i>	<i>JMR</i>
Nov-15-10	<i>Telephone call with Attorney Greenberg re: Request additional adjournment due to conversion</i>	<i>0.40</i>	<i>90.00</i>	<i>JMR</i>

Nov-18-10	Review of documents re: Order indicating conversion of case by December 13, 2010	0.20	45.00	JMR
	Letter to client Ray re: Advise to contact us immediately to discuss case; further action to be taken in connection with client's matter	0.10	22.50	JMR
	Telephone call with client Ray re: Issues with conversion of case to chapter 7; likely conversion to chapter 11; further action to be taken in connection with client's matter	0.30	67.50	JMR
Nov-22-10	Review of documents re: Order indicating that the conversion date is December 31, 2010	0.10	22.50	JMR
	Letter to court Robert Heim re: To determine the correct date of conversion	0.10	22.50	JMR
Nov-23-10	Drafting of documents re: Fee application; fee application coversheet; form of order and COS	3.60	810.00	JMR
	Review of file; letter to client Ray re: Status of client's matter; further action to be taken in connection with client's matter	0.50	112.50	JMR
	Totals	94.60	\$21,285.00	

DISBURSEMENTS

	Express Mail	25.00
	Parking	9.00
	Postage	25.43
Feb-01-10	Electronic Filing Fee	274.00
	Credit Report Fee	70.00
Feb-17-10	Electronic Filing Fee	26.00
	Totals	\$429.43

Total Fee & Disbursements for all charges on this matter \$21,714.43

TAX ID Number 261110894

PAYMENT DETAILS

Oct-16-08	On Account of Fees & Disbursements 1,800.00
Oct-28-08	On Account of Fees & Disbursements – VoidNSF -1,800.00
Oct-28-08	On Account of Fees & Disbursements 1,800.00

Total Payments	<hr/> \$1,800.00
TOTAL AMOUNT DUE AT THIS TIME	\$19,914.43